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*Attorneys for Plaintiff**Johnson & Johnson Health Care Systems Inc.***UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY****JOHNSON & JOHNSON****HEALTH CARE SYSTEMS INC.,**

Plaintiff,

vs.

SAVE ON SP, LLC,

Defendant.

:

Civil Action No. 22-2632(ES)(CLW)

:

Hon. Esther Salas, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J

:

NOTICE OF MOTION TO SEAL

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COUNSEL:

PLEASE TAKE NOTICE that on October 16, 2023 at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems, Inc. (“JJHCS”) shall apply before the Honorable Cathy L. Waldor at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order, pursuant to Local Civil Rule 5.3, without objection from Defendant Save On SP, LLC (“SaveOnSP”), to (i) permanently maintain under seal the parties’ joint letter, dated June 23, 2023, regarding the request by Save On SP, LLC (“SaveOnSP”) to compel discovery from non-JJHCS entities or individuals and accompanying exhibits (ECF No. 122, the “June 23 Letter”); and (ii) permit the parties to file the proposed public version of the June 23 Letter attached as Exhibit A to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS shall rely upon the accompanying Greenbaum Declaration and Appendix in Support of Motion to Seal. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

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By: s/ Jeffrey J. Greenbaum
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*Attorneys for Plaintiff Johnson & Johnson
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Dated: September 22, 2023